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Attorneys for Defendants
MODERN GROUP LTD. AND DRAGON ESP, LTD.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

FREDERICK GRANGE,

Plaintiff,

v.

MODERN GROUP LTD., DRAGON ESP,
LTD., ESPM, INC., and DOES 1 through 25,
inclusive,

Defendants.

Case No. CIV.S-04-1815 WBS JFM

**STIPULATION AND [PROPOSED]
ORDER REGARDING EXTENSION OF
DISCOVERY CUT-OFF**

STIPULATION

IT IS HEREBY STIPULATED, by and between the parties hereto, through their respective counsel, that the discovery cut-off date established in the Court's December 2, 2004, Case Management Order, be extended 30 days up to and including September 29, 2005. The extension of the discovery cut-off date will not effect any of the other dates set by the Court.

Dated: August __, 2005

DILLINGHAM & MURPHY, LLP
ERIC B. SIMON
LUCY F. WANG

By: _____
Attorneys for Defendant
MODERN GROUP LTD. AND
DRAGON ESP, LTD.

1 Dated: August __, 2005

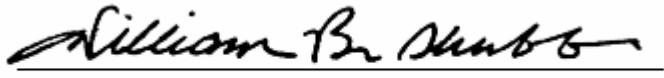
SCHEER & IMFELD, LLP
MICHAEL D. IMFELD

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5 By: _____
Attorneys for Plaintiff
6 FREDERICK GRANGE
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8 **ORDER**

9 IT IS SO ORDERED.

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11 Dated: August 4, 2005


12 WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE
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